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VIA CM/ECF and FIRST CLASS MAIL

December 14, 2022

Hon. Steven L. Tiscione, Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza,
Central Islip, NY 11722

**RE: HAMMOCK ET AL. V. MOVING STATE TO STATE LLC., ET. AL
EDNY CASE NO. 18 Civ. 05628 (RPK) (SLT)**

Dear Justice Tiscione:

Our office represents the Defendant(s), Yarin Nadel and Corporate Entities, in connection with the above-referenced matter.

Our office requests that this Honorable Court accept the herein as reply to Counsel's request for a pre-motion conference.

As outlined in our prior correspondence to the court, our office firmly believes that a pre-motion conference on this matter is a waste of judicial time and resources while, accordingly, yet another way of opposing counsel to unnecessarily vex, annoy, and harass the Defendants in this matter.

Opposing counsel, who himself has not appeared before the court but rather Of Counsel from his office, has failed to understand that the court has provided us with the on, or before, date of February 23, 2022, to complete discovery.

Notwithstanding that, our office had made the court, as well as opposing counsel, aware that a fire in our client's place of work resulted in the destruction of numerous files, of which our client is obtaining copies of to provide in reply to the discovery demands.



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Also, it should be noted that our office had served discovery demands to opposing counsel on October 14, 2022 and we have yet to receive any replies since.

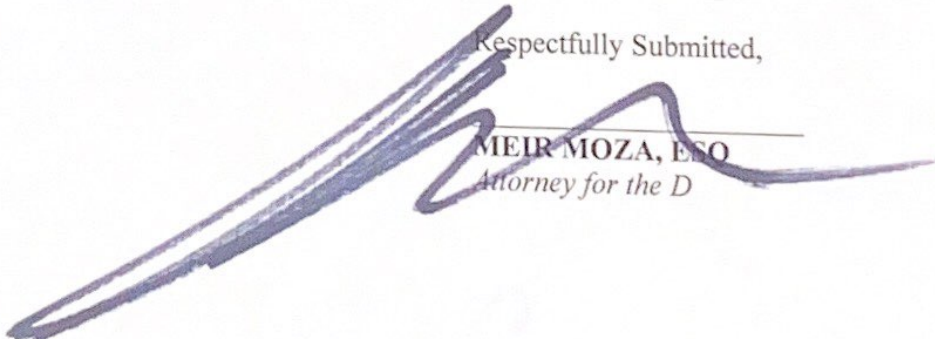
The court's new discovery order and circumstances regarding discovery were stated unequivocally, however counsel is still requesting a pre-motion conference which we believe, based on the foregoing reasons, is frivolous and a waste of judicial time.

Counsel's request to strike the pleadings and to have this Honorable Court issue sanctions do not meet the court's requirement in pleading for either. In fact the only sanctionable action here are the frivolous ones engaged by opposing counsel in wasting judicial time and resources with frivolous requests.

We request that this Honorable Court deny the Plaintiffs' request for pre trial motion conference.

We thank the court for its indulgence in this matter.

Respectfully Submitted,


MEIR MOZA, ESQ.
Attorney for the D